

1 Robert A. Julian (SBN 99469)
2 Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
1160 Battery Street, Suite 100
3 San Francisco, CA 94111
Telephone: 628.208.6434
4 Facsimile: 310.820.8859
Email: rjulian@bakerlaw.com
5 Email: cdumas@bakerlaw.com

6 Eric E. Sagerman (SBN 155496)
7 Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
11601 Wilshire Blvd., Suite 1400
8 Los Angeles, CA 90025-0509
Telephone: 310.442.8875
9 Facsimile: 310.820.8859
Email: esagerman@bakerlaw.com
10 Email: lattard@bakerlaw.com

11 *Counsel for Official Committee of Tort Claimants*

12 **IN THE UNITED STATES BANKRUPTCY COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14 **SAN FRANCISCO DIVISION**

15 In re:	Bankruptcy Case
16 PG&E CORPORATION	Case No.: 19-30088 (DM)
17 – and –	Chapter 11
18 PACIFIC GAS AND ELECTRIC	(Lead Case)
19 COMPANY,	(Jointly Administered)
20 Debtors.	DECLARATION OF ROBERT A.
21 <input type="checkbox"/> Affects PG&E Corporation	JULIAN IN SUPPORT OF OFFICIAL
22 <input type="checkbox"/> Affects Pacific Gas and Electric Company	COMMITTEE OF TORT
23 <input checked="" type="checkbox"/> Affects both Debtors	CLAIMANTS' LIMITED JOINDER,
24 <i>*All papers shall be filed in the Lead Case,</i>	OBJECTION AND COUNTER
<i>No. 19-30088 (DM)</i>	MOTION TO DEBTORS' WILDFIRE
	ASSISTANCE PROGRAM MOTION
	(DKT. NO. 1777)
	Date: May 22, 2019
	Time: 9:30 a.m. (Pacific Time)
	Place: United States Bankruptcy
	Court
	Courtroom 17, 16 Floor
	San Francisco, CA 94102

1 ROBERT A. JULIAN, under penalty of perjury, declares:

2 1. I am a partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort
3 Claimants of PG&E Corporation and Pacific Gas and Electric Company (collectively the
4 “**Debtors**”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the Official Committee of Tort Claimants’
6 Limited Joinder, Objection and Counter Motion (“**Joinder**”) to the Debtors’ Wildfire Assistance
7 Program Motion (Dkt. No. 1777).

8 3. Unless otherwise stated in this Declaration, I have knowledge of the facts set forth
9 herein and, if called as a witness, I would testify thereto.

10 4. Attached hereto as **EXHIBIT A** is a true and correct copy of Pacific Gas & Electric
11 Company Safety Model Assessment Proceeding Prepared Testimony, CPUC, May 1, 2015.

12 5. Attached hereto as **EXHIBIT B** is a true and correct copy of *California North Bay*
13 *Fire Cases*, Judicial Council Coordination Proceeding No. 4955, Master Complaint – Individual
14 Plaintiffs (Cal. Super. Ct. Mar. 12, 2018).

15 6. Attached hereto as **EXHIBIT C** is a true and correct copy of *US v. PG&E*, No. CR
16 14-0175 WHA, Order Adopting New Conditions of Probation (Dkt No. 1040) (N.D. Cal. Apr. 2,
17 2019).

18 7. Attached hereto as **EXHIBIT D** is a true and correct copy of PG&E, Form 8-K
19 (Jan. 13, 2019).

20 8. Attached hereto as **EXHIBIT E** is a true and correct copy of PG&E, Form 8-K
21 (Feb. 28, 2019).

22 9. Attached hereto as **EXHIBIT F** is a true and correct copy of PG&E, Form 10-Q
23 (May 2, 2019).

24 10. Attached hereto as **EXHIBIT G** is a true and correct copy of the hearing transcript
25 from May 7, 2019 in *US v. PG&E*, No. CR 14-0175 WHA (N.D. Cal.)

26 11. Attached hereto as composite **EXHIBIT H** are true and correct copies of signed
27 declarations or letters of fire victims who have suffered and continue to suffer the impact of the
28

1 loss of their homes in fires in 2018, 2017 and 2015, and are submitting collectively in support of
2 the Joinder:

- 3 a. Elizabeth "Libby" Andresen
- 4 b. Landon Andresen
- 5 c. Paul Andresen
- 6 d. Tracy Lynne Arnbrister
- 7 e. Lara Balan
- 8 f. Kevin Burnett
- 9 g. Alex Cranstoun
- 10 h. Robert DeWalt
- 11 i. Lee Ann Estep
- 12 j. Simmon Flagg
- 13 k. James Gaebe
- 14 l. Katherine Gaynor
- 15 m. William Goggia
- 16 n. Kathleen Gross
- 17 o. Jennifer Grove
- 18 p. Kenneth W. Grove, Jr.
- 19 q. Isa Jacoby
- 20 r. Michael Krzanich
- 21 s. Dawn Lazzarino
- 22 t. Janet Lucich
- 23 u. Cindy Ly
- 24 v. Rachel Marin
- 25 w. Leslie Moore
- 26 x. Richard Allen Mootz
- 27 y. Christine Mountain
- 28 z. Kevin Mulder

1 aa. Kenneth Nelsen
2 bb. Nicholas D. Powell
3 cc. Michael Pulliam
4 dd. Dominic Romeri
5 ee. Faith Lynn Sandoval
6 ff. Kenneth Sevenns
7 gg. Eric Shoemake
8 hh. Judy Simmons
9 ii. Michael Slightom
10 jj. Tiffany L. Slightom
11 kk. Betty J. Taylor
12 ll. Cindy Tinker
13 mm. Brenda Tucker
14

15 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true*
16 *and correct to the best of my knowledge and belief.*

17
18 Executed on May 15, 2019

19 */s/ Robert A. Julian*
20 By: Robert A. Julian
21
22
23
24
25
26
27
28